

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No.: 17-21541-cmb
Bruce D. Pachete, Debtor : Chapter 13
: Related to Doc. #80

:

RESPONSE TO RULE TO SHOW CAUSE

AND NOW COMES the Debtor, Bruce D. Pachete, by his counsel, Shawn N. Wright, Esquire, to state the following in response to the Rule to Show Cause issued by this Honorable Court:

1. A response to the Notice of Mortgage Payment Change filed by Movant was not timely filed in this matter.
2. As a result, this Honorable Court issued a Rule to Show Cause at Document Number 80.
3. Undersigned Counsel has entered his appearance on behalf of the Debtor on December 10, 2021, and has also filed a Declaration to the Notice of Mortgage Payment Change.
4. Attorney Mark Moynihan is in the process of withdrawing from his Chapter 13 cases and is in the processing of retiring from the practice of law.
5. Undersigned Counsel will be representing the Debtors in this case in the future.

WHEREFORE, the Debtor so responds to the Rule to Show Cause.

Attorney for Debtor

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